

1 [Counsel Listed on Signature Block]

2	MCU CLOCKING SOLUTIONS, INC., Plaintiff, v. ATMEL CORPORATION, Defendant.	Case No. 5:15-cv-02212-PSG
7	MCU CLOCKING SOLUTIONS, INC., Plaintiff, v. FREESCALE SEMICONDUCTOR, INC., Defendant.	Case No. 5:15-cv-02213-PSG
12	MCU CLOCKING SOLUTIONS, INC., Plaintiff, v. MICROCHIP TECHNOLOGY, INC.	Case No. 5:15-cv-02546-PSG

16 **JOINT ADMINISTRATIVE MOTION TO CONSIDER CASES RELATED AND TO**
17 **SCHEDULE INITIAL CASE MANAGEMENT CONFERENCE FOR AUGUST 11, 2015**

18 Pursuant to Civil L.R. 3-12, the parties in Case Nos. 5:15-cv-02212-PSG, 5:15-cv-02213-
19 PSG, and 5:15-cv-02546-PSG (“Proposed Related Actions”) submit this joint administrative motion
20 to consider these cases related to each other. The parties further propose, pursuant to Civil Local
21 Rule 6-2(a), that the Case Management Conferences in all three Proposed Related Actions be
22 scheduled for August 11, 2015.

24 **PROCEDURAL HISTORY**

25 All three Proposed Related Actions were recently transferred by stipulation to the United
26 States District Court for the Northern District of California from the United States District Court for
27 the District of Delaware, and have all been assigned to Magistrate Judge Paul Singh Grewal. The
28 JOINT ADMINISTRATIVE MOTION TO CONSIDER CASES RELATED AND TO SCHEDULE INITIAL CASE
MANAGEMENT CONFERENCE FOR AUGUST 11, 2015
CASE NO. 5:15-cv-02212-PSG

Plaintiff in all three Proposed Related Actions is MCU Clocking Solutions, Inc. (“MCU”), and all three actions involve U.S. Patent No. 6,292,045. Two of the three Proposed Related Actions, Case Nos. 5:15-cv-02213-PSG and 5:15-cv-02546-PSG, also involve U.S. Patent No. 7,296,170. The Case Management Conferences in Case Nos. 5:15-cv-02212 and 5:15-cv-02213 are currently both scheduled for June 30, 2015, whereas the Case Management Conference in Case No. 5:15-cv-02546 has not yet been scheduled.

BRIEF STATEMENT OF RELATIONSHIP BETWEEN CASES

The Proposed Related Actions meet the criteria for related cases under Civil L.R. 3-12. MCU alleges that the named Defendants in each of the actions infringe one or both asserted patents by making, using, offering for sale, selling, and/or importing microcontrollers that embody every element of at least one Claim of either or both of the asserted patents. Discovery, motion practice, and hearings, therefore, are likely to concern many of the same issues. Furthermore, the parties believe that proceeding with uncoordinated cases before separate judges would cause an unduly burdensome duplication of labor and expense. While the parties recognize that there may be separate trials in each of the three separate cases, respectively, they believe coordination of pre-trial matters will be beneficial.

Additionally, the parties believe that a single Case Management Conference for all three Proposed Related Actions would avoid a needless duplication of effort and expense by the parties, and would also serve the interests of judicial economy by allowing the Court to conduct a single Case Management Conference rather than multiple conferences.

CONCLUSION

For the reasons stated above, the parties respectfully request that the Proposed Related Actions all be deemed to be related to each other. The parties further propose that, pursuant to Civil

1 Local Rule 6-2(a), a single Case Management Conference for all three Proposed Related Actions be
2 scheduled for August 11, 2015, with the parties filing a Joint Case Management Statement by August
3 4, 2015.

5 Dated: June 17, 2015

6 Respectfully Submitted,

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9 **MICROCHIP TECHNOLOGY, INC.**

10 **ATTESTATION OF CONCURRENCE IN FILING**

11 Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this
12 document has been obtained from each of the Signatories listed above.

13 */s/ Vasilios E. Sanios*
14 Vasilios E. Sanios

1 PURSUANT TO THE JOINT MOTION OF THE PARTIES, IT IS SO ORDERED.
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4 Date: June 18, 2015


Hon. Paul S. Grewal
United States District Court Magistrate Judge

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JOINT ADMINISTRATIVE MOTION TO CONSIDER CASES RELATED AND TO SCHEDULE INITIAL CASE
MANAGEMENT CONFERENCE FOR AUGUST 11, 2015
CASE NO. 5:15-cv-02212-PSG

PROOF OF SERVICE

I, Vasilios E. Sanios, Esquire, hereby certify that on the 17th day of June, 2015, I served the above JOINT ADMINISTRATIVE MOTION TO CONSIDER CASES RELATED AND TO SCHEDULE THE INITIAL CASE MANAGEMENT CONFERENCE FOR AUGUST 11, 2015, via email, to the following addresses:

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